2006 DOE
Price-Anderson Coordinator Training
April 5, 2006

Presentation on:

The Challenges of Maintaining a Good Price-Anderson Program at a Closure Site

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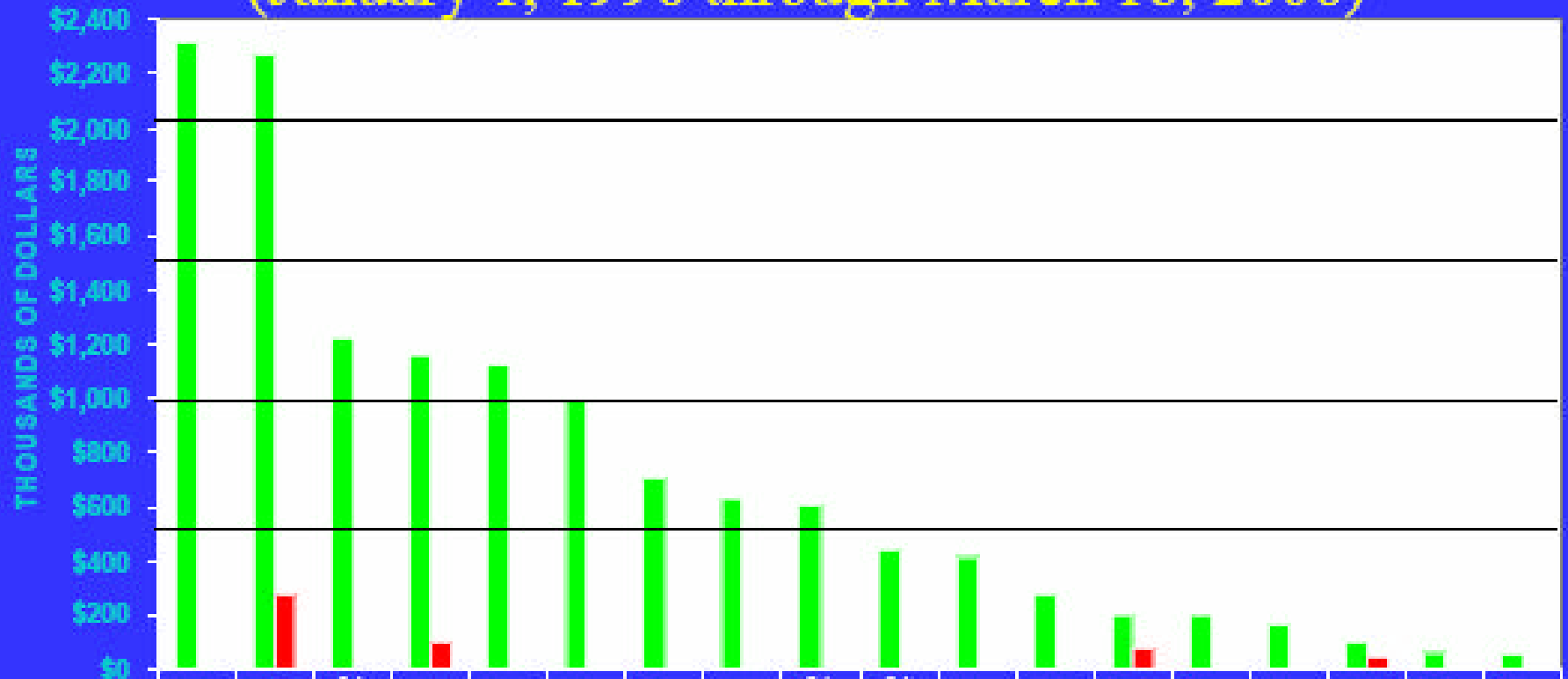
Background – Fernald PAAA Program

- Involved since the inception of Price-Anderson
- Constantly reviewed, analyzed, and used lessons learned from around the DOE Complex
- Modified and enhanced it's PAAA Program based on this analysis
- Maintained a good assessment program, coupled with a strong issue identification and reporting process
- PAAA Program – Reviewed annually by contractor and local DOE
- Fundamentally sound and mature PAAA Program

DOE-OE Enforcement Action

Civil Penalties and Consent Order Remedies (January 1, 1996 through March 18, 2006)



	Los Alamos	Hanford	Oak Ridge (Y-12)	Rocky Flats	LLNL	Argonne (ANL)	Savannah River	Idaho	Oak Ridge (ETTP)	Oak Ridge (ORNL)	Mound	Wash. TRU	Pantex	WTP Richland	Brookhaven	FCP	Sandia	Portsmouth
Civil Penalties	$2,310	$2,268	$1,224	$1,161	$1122	$990	$705	$629	$606	$440	$415	$276	$207	$196	$170	$98	$81	$55
Consent Order		$275		$100									$75			$40		

Note: Civil penalties are currently waived by statue for LANL, Argonne, LLNL, and Brookhaven (pending transition under any new contract)

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DOE-OE Program Review – July 2005 Purpose

- DOE-OE:
  - Hadn't visited our site or conducted a Program Review since 1999
  - Wanted to evaluate our program before we closed the site (Scheduled for July 2006)
  - Planned to compare Fernald's PAAA Program implementation with others they had recently assessed
  - Was interested in evaluating our process and understanding why we had not reported anything onto NTS for approximately nine 9 months

DOE-OE Program Review – July 2005 Results (Strengths)

- Experienced staff with comprehensive and well written procedures
- A large number and variety of screened documents
- Significant involvement of the PAAA Oversight Team
- Site-specific NTS reporting thresholds
- NTS closure and validation process is extremely rigorous and well documented
- The PAAA Program Annual Report provides a detailed statistical description of the program

DOE-OE Program Review – July 2005 Results (Areas for Improvement)

- Field Implementation of the Radiation Protection Program by both project personnel and radiation control technicians.
- Thoroughness of our Field Oversight and Triennial Assessments of 10 CFR 835 Requirements.
- Integrated Assessment Schedule and it's association with critical tasks to closure.
- Proper 10 CFR 835 citations and reporting threshold for potential PAAA noncompliances, including the overall effectiveness of our trending, assessment and precursor identification process.

PNOV Issued – EA-2005-05

1. Multiple Radiological Deficiency Reports for RWP violations, not rolled up or reported onto NTS or tracked to closure – Severity Level III
2. The process of conducting internal audits of the radiation protection program was not sufficiently rigorous to ensure that all functional elements of the program were effectively assessed – Severity Level III
3. Inadequacies in the Quality Improvement Process resulting from our failure to elevated RDRs to NCRs and to properly trend RDRs and take effective actions to correct negative trends – Severity Level III

Why did this happen

- Hubris
  - Missed the warning signs
  - Had ample data to indicate that our Rad Program and Process Improvement functions were not effective
  - Could have avoided the problems that surfaced during the PAAA Program Review and subsequent PNOV
- Cultural Change in our Rad Program
- Reduction in significant nuclear safety consequences
- Programmatic resources were reduced faster than actual work completion
- Shift from compliance based to expert based program implementation

What did Fernald find

1. Line management and workers are not being held accountable for nuclear safety performance.
2. Nuclear safety requirements are not being strictly enforced at Fernald.
3. Assessments are frequently ineffective in identifying emerging or significant issues and corrective actions to address negative trends are less than adequate.
4. The availability of qualified and trained resources in the rad compliance and oversight areas may be a contributing factor to ongoing compliance issues.
5. The PAAA Oversight Team has not been actively engaged in surfacing issues or identifying negative/repetive trends before they become more significant.

How did Fernald respond

- Recognized the significance of the findings and the importance of our PAAA Program.
- Viewed this as an opportunity to identify and correct our problems before they become even more significant and impact work during the final months of the project.
- Made changes to the overall safety program, not just the nuclear safety program.
- Corrective actions were implemented in broad areas, to support the needed change in cultural and response to problems and issues.

What can we all learn from this action

- Compliance, means Compliance (It's not an arbitrary condition).
- Resources are just as critical to the success of a program as they are to the success of a project.
- Negative cultural changes that occur near the end of a project are very difficult to reverse.
- Past performance doesn't count. Vigilance is required to ensure ongoing program success.
- Entropy has no safe harbor, even at a closure site.